

June 26, 2017

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: Notice of Ex Parte Communication, ET Docket No. 15-170; Draft First Report and Order of June 22, 2017

Dear Ms. Dortch:

On June 26, 2017, members of the Mobile & Wireless Forum (MWF), a global trade association, met with the FCC Lab together with other OET staff. Attendees are set out on the attached lists. The subjects of Self-Declarations of Conformity and streamlining the certification requirements for Class II Permissive Changes was discussed as shown in the Attachment.

The MWF has an ongoing concern about the ability of the current certification procedures to meet the needs of the market as an increased variety of telecom devices are developed for the Internet of Things. Consequently, the MWF believes that current certification procedures should be streamlined by removing unneeded reviews in those instances where non-compliance is unlikely to be an issue.

The MWF's proposal, as set out in Attachment is for the FCC to permit such streamlined procedures for devices that meet the following basic criteria: low power and low SAR. MWF proposes a power level of up to 30mW EIRP or 18mW ERP and a SAR level of up to 0.08 W/Kg to qualify for the streamlined procedure. We also recommend that the devices meet the additional following criteria: devices are not on the PAG list; devices must be tested in an accredited lab; if device contains multiple radio then combined power and SAR is limited to the above level. If all criteria are met, the device would qualify for Self-Declaration of Conformity.

The MWF members also believe that it is essential for the FCC's certification procedures to be subject to continuous review for purposes of ongoing streamlining. The Class II permissive change procedures provide a rich area for such review. The proposal in the attachment represents MWF's basic recommendation for removing unnecessary impediments to a product's maintaining certification while undergoing routine, minor design modifications. The proposal would allow the

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class II change procedure to apply for products where the modification would result in SAR that is 10% or less of the current FCC grant listing for the product, provided that the overall SAR is below the FCC limit. This change would also include additions of new antenna and changes to the filter circuits where the transmit power or out-of-band emissions are equal to or lower than the measured value in the original test report.

MWF submits this proposal with the objective of addressing and preempting capacity issues resulting from the burgeoning number of devices in the U.S. Removing unneeded certification procedures will leave room for TCBs and the FCC to focus on more sophisticated devices. We request that FCC consider it in the context of preparation for the future.

Respectfully Submitted,

/s/ Charles Eger Charles Eger MMF Consulting Staff

cc: FCC staff on below list

MWF members on below list

FCC STAFF:

Dr. Rashmi Doshi
Dr. Kwok Chan
William Hurst
Axel Rodriguez
Bahman Baidopour – via phone
Martin Doczkat – via phone
Michael Ha – via phone
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MOBILE WIRELESS FORUM:

Chuck Eger, MWF Consulting Staff
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Paul Green, Intel – via phone
Robert Paxman, Intel – via phone
John Roman, Intel – via phone
Jacky Yeung, Lenovo – via phone
Antonio Faraone, Motorola Solutions – via phone
Rob Kubik, Samsung
Kai Niskala, Samsung – via phone
Craig Gatto, Zebra Technologies – via phone



Attachment



SDoC Proposal

- The TCB program is effective: reduced time to market for a number of products and expanded capacity (i.e., numbers of devices) for review
- However, with the potential of IoT products the increase in demand for certification of products threatens to over burden the TCBs.
- As technologies evolve for low power IoT, the need for a faster review time for IoT devices such as sensors, RFID devices and other devices will require a new approach
- This proposal is intended to complement the TCB program by allowing manufacturers to self-certify low power wireless devices, freeing TCB's to focus on more complex, higher power devices.



SDoC Process

SDoC limited at this time to the following requirements:

- · Device not on the FCC PAG list
- Must be tested in an Accredited Test lab recognized by FCC.
- Single radio technology only or if multiple technologies, overall combined max power limited to max SDoC radio Transmit power
- Maximum of 30mW EIRP or 18mW ERP
- SAR less than 0.8W/Kg
- Labeling per DoC scheme (FCC logo)

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Class II Changes

Streamline the approval process by permitting a Class II change for any change where SAR is within 10% or less than the current FCC grant provided it is under the limit, including:

- Adding new antenna
- Changes to filter circuits where Transit power or OOBE emissions are of equal or lower measured value.